

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*
State Engineer

Plaintiff,

vs.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941 BB-ACE

RIO CHAMA STREAM SYSTEM
Section 7: Rutheron & Plaza Blanca

Subfile No. CHRU-004-0044

MOTION FOR EXTENSION OF TIME

COMES NOW the Plaintiff State of New Mexico, *ex rel.* State Engineer, and respectfully requests the Court to grant an extension of time for the filing of supplemental briefs pursuant to the Order entered October 19, 2005 (Docket No. 8035), and as grounds therefore Plaintiff states:

1. Supplemental briefs in this matter are due thirty (30) days from the entry of the notice of filing of the transcript for the October 14, 2005, hearing before the Special Master. *See* Order (No. 8035). The Notice of Filing of Transcript was filed with the Court on November 30, 2005 (No. 8070), and supplemental briefs are therefore due by December 30, 2005.

2. Plaintiff's counsel has previously made plans to travel out-of-state with his family from December 19th to January 1, 2006, and the remaining time within which to complete and file a supplementary brief in this matter appears insufficient.

3. Plaintiff respectfully requests an extension of time until January 16, 2006 for all parties to file supplemental briefs.

4. Walter L. Reardon, Jr., counsel for Defendant Coors, has no objection to the granting of this motion.

5. Peter B. Shoenfeld, counsel for Defendants Padilla and Andrews, has no objection to the granting of this motion.

WHEREFORE the Plaintiff State of New Mexico respectfully requests the Court to grant an extension of time until January 16, 2006, for all parties to file supplementary briefs pursuant to the Order entered October 19, 2005.

Respectfully submitted,

/s/ Ed Newville
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CERTIFICATE OF SERVICE

I hereby certify that copies of the above Motion for Extension of Time were mailed to following persons on December 14, 2005.

/s/ Ed Newville
Edward G. Newville

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